

Department of Energy

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3304

DOE-0041-01

OCT 12 2000

Mr. Paul Pardi, RCRA Group Leader and FFCA Project Manager Ohio Environmental Protection Agency Division of Hazardous Waste Management 401 East 5th Street Dayton, Ohio 45402-2911

Dear Mr. Pardi:

SUBMITTAL OF CROSS-REFERENCE INDEX PURSUANT TO THE DIRECTOR'S FINAL FINDINGS AND ORDERS FILED JUNE 6, 1996

Reference: Letter and Director's Final Findings and Orders, T. E. Crepeau,

OEPA to Phil Hamric, U. S. DOE and John Bradburne, FERMCO, dated

June 6, 1996.

In accordance with Section V, Order #2 of the referenced Director's Final Findings and Orders (DF&O), enclosed is a cross-reference index of Hazardous Waste Management Unit (HWMU) closure components and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) documents for those HWMUs identified in Attachment A of the DF&O. The index links specific components of Ohio Environmental Protection Agency's (OEPA) Closure Plan Review Guidance for Resource Conservation and Recovery Act (RCRA) Facilities related to substantive closure requirements with the appropriate CERCLA document, which addresses those components. The list is cumulative and provides page numbers and sections for those CERCLA documents, which have already been submitted.

The submittal of this cross-reference index meets the requirement in Section V to provide this document following the submittal of a CERCLA document identified in the cross-reference index. The Final Certification Report for Area 1, Phase II was submitted to the OEPA and U.S. EPA on October 2, 2000. The specific reference to this document in the cross-reference table has been highlighted. Note that a copy of this table was faxed to Phil Harris of the OEPA on October 10, 2000, in order to meet the time frames for submittal under the DF&O.

Mr. Paul Pardi

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OCT 12 2000

If you have any questions regarding this matter, please contact Shannon Kaster at (513) 648-3157.

Sincerely,

FEMP:Kaster

Johnny W. Reising Fernald Remedial Action Project Manager

Enclosure

cc w/enclosure:

S. Kaster, OH/FEMP

R. V. Holmes, Fluor Fernald, Inc./3

M. A. Jewett, Fluor Fernald, Inc./52-2

T. A. Poff, Fluor Fernald, Inc./65-2

AR Coordinator, Fluor Fernald, Inc./78

cc w/o enclosure:

A. Tanner, OH/FEMP

CLOSURE PLAN COMPONENT ¹	CERCLA DOCUMENT	CROSS REFERENCE INDEX
Description/Detailed Drawing of Waste Management Unit(s) to be Closed (Closure Guidance Item 3.2 and 3.4)	OU1 FINAL Remedial Investigation Report, August1994	Waste Pit 4 (27): Description, pp. 1-23 to 1-24; History, pp. 1-35 to 1-36; Drawings, pp. 1-83, 1-88 Waste Pit 5 (42): Description, p. 1-24 to 1-27; History, pp. 1-36 to 1-37; Drawings, pp. 1-83, 1-89
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	HWMU Component Number and Associated D&D complex: Table 3-10, p. 3-71 D&D Complex Locations: Figure 2-2, p. 2-17
	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Drawing of HWMU: To be submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25): Figure D-11
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse – Bldg. 81 (35): Figure D-10, D-11
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): No drawing available for this unit
		KC-2 Warehouse – Bldg. 63 (34): Figure D-22, D-23
		UNH Tanks – NFS Storage Area (46): Figure D-1
	FINAL Implementation Document for HWMUs #28 and #50 , December 1998	Trane Incinerator (28): Attachment 1
		UNH Tanks – Raffinate Bldg. (50): Attachment 2
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse - Bldg. 79 (37): Appendix D
	OU5 FINAL Remedial Investigation Report, March 1995	General Location Map of HWMUs to be Closed Under CERCLA: Figure 4-112 Size and Dimensions of HWMUs: Table 1-12 FEMP Topographic Map: Figure 3-1 General HWMU Information and Locations Within OU5 Areas, Appendix D: Plant 1 Storage Pad (20): Plant 1 Area, Section D.2.1, p. D.2-2
-		UNH Tanks (46-50), NAR System (10), Trane Incinerator (28): Plant 2/3 Area, Section D.2.2, p. D.2-19

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Description/Detailed Drawing of Waste Management Unit(s) to be Closed (Closure Guidance Item 3.2 and 3.4) – Continued	OU5 FINAL Remedial Investigation Report, March 1995 - Continued	Storage Pad N of Plant 6 (36): Plant 6 Area, Section D.2.4, p. D.2-28 Plant 8 East and West Drum Storage Pads (17, 18), Box Furnace (14), Oxidation Furnace #1 (15): Plant 8 Area, Section D.2.5, p. D.2-33 Sludge Drying Beds (41): Sewage Treatment Plant Area, Section D.2.7, p. D.2-41 Abandoned Sump West of Pilot Plant (22), Tank T-2 (54): Pilot Plant Area Section D.2.8, p. D.2-45 Drum Storage Area Near Lab Loading Dock (4), Drum Storage Area S of W-26 (5): Laboratory Area, Section D.2.9, p. D.2-51 Tank Farm Sump (11): Tank Farm and Boiler House Area, Section D.2.13, p. D.2-69 Fire Training Facility (1): Fire Training Area, Section D.2.18, p. D.2-86
List of Hazardous Waste(s) Managed in Unit(s) (Closure Guidance Item 3.5)	OU1 FINAL Remedial Investigation Report, August 1994	Waste Managed in Unit: Waste Pit 4 (27): pp. 4-60 to 4-70, pp. 1-35 to 1-36 Waste Pit 5 (42): pp. 4-70 to 4-77, pp. 1-36 to 1-37
	OU3 FINAL Remedial Investigation/Feasibility Study Report OU3 Implementation Plans for Above-Grade	Waste Managed in HWMU: Table K-1 Waste Managed in HWMU:
	Pinal Plant 1 Complex - Phase I Implementation Plan, March 1996 FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	To be Submitted for Each D&D Complex Plant 1 Storage Bldg. – Bldg. 67 (25): Section 3.7, p. 42 Plant 9 Warehouse – Bldg. 81 (35) Section 3.13, pp. 39 to 40
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, p. 36
		KC-2 Warehouse - Bldg. 63 (34) Section 3.23, pp. 41 to 43 UNH Tanks - NFS Storage Area (46): Section 3.1, p. 23



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	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Section 3.9, p 37
·	OU5 FINAL Integrated Remedial Investigation Report, March 1995	HWMUs with Potential Soil Contamination: Tables 4-68 and 4-69
	OU5 FINAL Feasibility Study Report, June 1995	HWMU Constituents of Concern (COCs) for Soil: Tables 4-4, 4-5 and 4-6
_	OU5 FINAL Sitewide Excavation Plan, July 1998	HWMU COCs: Table 2-1
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	HWMU COCs: To be Submitted
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Section 3.0, Disposition of Sludge Cake and Associated Debris, p. 3-1
	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-11
Removal of Waste and Contaminated Media (Closure Guidance Item 3.6)	OU1 FINAL Remedial Design Documents Package, August 1998	Removal of Waste – Waste Pit 4 (27), Waste Pit 5 (42): Volume 2, Excavation Plan
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan May 1997	General Methods for Removing and Storing Waste: HWMU Decontamination, Section 3.2.3, p. 3-13; Materials Management, Section 3.3, pp. 3-30 to 3-63; HWMU Remediation (use of Safe Shutdown, D&D of complexes), Section 3.5.3, pp. 3-69 to 3-73
	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Removing Waste from HWMU Storage, Treatment, and Disposition of Waste: To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex - Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg Bldg. 67 (25): Section 3.7, p. 42
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3. Removal of Waste and Contaminated Media (Closure Guidance Item 3.6) - Continued	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse – Bidg. 81 (35): Section 3.13, pp. 39 to 40
·	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37
·		KC-2 Warehouse – Bldg. 63 (34) Section 3.23, p. 42
		UNH Tanks – NFS Storage Area (46): Section 3.1, pp. 23 to 24
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28): Remedial Tasks
		UNH Tanks – Raffinate Bldg. (50): Remedial Tasks, HWMU Decontamination
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Section 3.9, p. 37
	OU5 FINAL Sitewide Excavation Plan, July 1998	Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F.3 to F.5, Implementation of Construction; Appendix I, Sitewide Excavation of Contamination by Constituent
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment and/or Disposition of Impacted Material: To be Submitted
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Removal of Sludge: Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Excavation of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4
	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36): Section 3.3.2, Concrete, Asphalt Pads, Roadways and Floors, p. 3-9; Section 3.4.2, HWMUs and USTs, p. 3-15; Section 3.4.3, General Excavation, pp. 3-15 to 3-17
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Schedule for Closure (Closure Guidance Item 3.7) - Continued	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	Accelerated Schedule for Conducting Safe Shutdown Activities at D&D Complexes: Figure 6-1, p. 6-3
		Schedule for Submitting D&D Packages: Table 6-1, p. 6-7
	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Schedule for Removing & Decontaminating Above-Grade Unit Structures and Equipment: To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25) Figure 4-1, p. 48
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse – Bldg. 81 (35) Figure 4-1, p. 43
	FINAL Misc. Small Structures Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28); KC-2 Warehouse - Bldg. 63 (34); UNH Tanks - NFS Storage Area (46): Section 4.0, pp. 45 to 46
	FINAL implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28); UNH Tanks – Raffinate Bldg. (50): Letter, J Reising to G. Jablonowski and T. Schneider, "Transmittal of RCRA/CERCLA Integrated Closure Implementation Document for the Trane Incinerator (HWMU No. 28) and UNH Tanks, Hot Raffinate Building (HWMU No. 50)," dated December 22, 1998
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse – Bldg. 79 (37): Figure 4-1, p. 42
	OU5 FINAL Remedial Design Work Plan, August 1996	Schedule for Submitting Remedial Design Documents for Soil: Table 4-1, p. 4-6
	OU5 FINAL Sitewide Excavation Plan, July 1998	Schedule for Submitting Remedial Design Documents: Table 1-5
	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Project-Specific Schedules: To be Submitted
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	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36) – Area 4A: Table G-3
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	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	Health and Safety Plan: Appendix E
	OU5 FINAL Sitewide Excavation Plan, July 1998	Health and Safety Plan: Section 6.0, Project Health and Safety; Table 6-1, Occupational Monitoring and Action Levels

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	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36): Section 5.0, Project Specific Health and Safety
6. Decontamination Efforts (Closure Guidance Item 3.10)	OU1 OU1 Complex D&D Implementation Plan	Decontamination of Equipment To be Submitted
	OU3 FINAL Integrated Remedial Design/Remedial Action Work Plan, May 1997	HWMU Decontamination: Section 3.2.3, p. 3-13 HWMU Remediation: Section 3.5.3, pp. 3-69 to 3-73 (use of Safe Shutdown, D&D of Complexes)
·	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Decontamination of Above-Grade Unit Structures and Equipment; To be Submitted for Each D&D Complex
	FINAL Plant 1 Complex – Phase I Implementation Plan, March 1996	Plant 1 Storage Bldg. – Bldg. 67 (25): HWMU Decontamination: Section 3.7, pp. 42 to 45 Materials Management: Table 2-1, p. 12
	FINAL Thorium/Plant 9 Complex Implementation Plan, August 1997	Plant 9 Warehouse – Bldg. 81 (35): HWMU Decontamination: Section 3.13, pp. 39 to 40 Materials Management: Table 2-4, p. 12
	FINAL Misc. Small Structure Implementation Plan, October 1998	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 3.17, pp. 36 to 37
		KC-2 Warehouse - Bldg. 63 (34) Section 3:23, pp. 42 to 43
		UNH Tanks – NFS Storage Area (46): Section 3.1, pp. 23 to 24
	FINAL Implementation Document for HWMUs #28 and #50, December 1998	Trane Incinerator (28): HWMU Decontamination
		UNH Tanks - Raffinate Bldg. (50): HWMU Decontamination
	FINAL Plant 6/East Warehouse Complex Implementation Plan, July 1999	Plant 6 Warehouse - Bldg. 79 (37): Section 3.9, p. 37
	OU5 FINAL Sitewide Excavation Plan, July 1998	Decontamination of Excavation Equipment: Section F.2.3, Installation of Decontamination and Wash Facilities



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	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Equipment Decontamination: Section 5.2, Loading and Hauling, pp. 5-2 to 5-3
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Remediation-Generated Water Management: Section 3.4.4, Remediation-Generated Wastewater Management, pp. 3-33 to 3-35
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7. Remediation Standards for Soils and Groundwater ² (Closure Guidance Items	OU1 FINAL Record of Decision, January 1995	Waste Pit (27, 42) Area: pp. 9-1 to 9-11 Tables B-5 to B-16
3.11, 3.11.1, 3.11.2, and 3.13)	OU1 Remedial Design Pre-Final Design Package II, March 1996	Waste Pit (27, 42) Area: pp. A-3 to A-7
	OU5 FINAL Record of Decision, January 1996	Final Remediation Levels (FRLs) for Soil and Groundwater: Table 9-3, p. 9-23 Table 9-4, p. 9-26
	OU5 FINAL Sitewide Excavation Plan, July 1998	Summary of Contaminant Levels Pertinent to Soil Remediation at the FEMP: Table 1-4; Final Remediation Levels: Section 2.1.3, p. 2-10 Constituents of Ecological Concern: Section 2.1.4, p. 2-13 Preliminary Identification of Primary, Secondary COCs and Ecological COCs Assigned to Remediation Areas: Table 2-7
·	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific FRLs: To be Submitted
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, pp. 3-3 to 3-4; Section 5.1, Excavation and Monitoring, pp. 5-1 to 5-2
	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36): Section 2.3.2.3, Location of HWMUs and USTs, p. 2-11
8. Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) – Includes	OU1 FINAL Remedial Investigation Report, August 1994	Procedures for Determining Nature and Extent of Contamination at Waste Pit Area: Waste Pit 4 (27), Waste Pit 5 (42): Chapter 2, pp. 2-1 to 2-161
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	OU5 FINAL Remedial Investigation Report, March 1995	Procedures for Determining Nature and Extent of Soil Contamination: Chapter 2, pp. 2-1 to 2-83
	OU5 FINAL Sitewide Excavation Plan, July 1998	Procedures for Certifying Attainment of Soil Cleanup: Section 2.2.2, p. 2-18 to 2-19; Section 2.2.5, p. 2-22 to 2-23; Section 3.4, p.3-22 to 3-23; Appendix G, Certification Design Rationale
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8. Sampling Plan and Analytical Procedures (Closure Guidance Item 3.14) – Includes Sampling to Define the Extent of Contamination and Sampling to Verify the	Area 1, Phase II Supplemental Characterization Package, August 1998	Sludge Drying Beds (41): Section 3.3, Material Disposition Sampling Plan, p. 3-3; Section 5.0, Excavation Monitoring, pp. 5-1 to 5-2
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Item 3.15)	OU1: FINAL Remedial Action Documents Package, April 1999	Processing of Waste Pit Waste – Waste Pit 4 (27), Waste Pit 5 (42): Operations and Maintenance (O & M) Plan for Remediation Facilities
	OU3 Implementation Plans for Above- Grade Decontamination and Dismantlement	Removal and Treatment of Waste in HWMU: To be Submitted for Each D&D Complex (where applicable)
	OU5 FINAL Feasibility Study Report, June 1995	Evaluation of Technologies and Process Options: Section 3.3, p. 3-5
	OU5 FINAL Sitewide Excavation Plan, July 1998	Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: Section 2.0, Remediation Issues and General Strategies; Section 3.0, General Implementation Approach; Section 4.0, Location Specific Excavation Approaches; Appendix B, Sitewide Sequencing Plan; Appendix F, Implementation of Construction; Appendix I, Sitewide Extent of Contamination by Constituent
	OU5 Integrated Remedial Design Packages (IRDPs) for Individual Remediation Areas	Area/Phase-Specific Excavation, Loading, Staging, Storage, Treatment, and/or Disposition of Impacted Material: To be Submitted
	Area 1, Phase II Supplemental Characterization Package, April 1999	Sludge Drying Beds (41): Management of Sludge: Section 3.3, Material Disposition Sampling Plan, p. 3-3; Management of Soil: Section 5.0, Excavation, pp. 5-1 to 5-4
	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36): Section 3.3.2, Concrete, Asphalt Pads, Roadways and Floors, p. 3-9; Section 3.4.2, HWMUs and USTs, p. 3-15; Section 3.4.3, General Excavation, pp. 3-15 to 3-17
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	OU1 FINAL Remedial Design Work Plan, June 1995	Revised ARARs: Tables A-24 and A-25
	OU5 FINAL Record of Decision, January 1996	Not Applicable, if Remediation Levels for Soil and Groundwater are Sufficient for a Clean Hazardous Waste Management Unit Closure ¹ : ARARs: Table B-3, p. B.3-10



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10. Landfill Closure Requirements – (if applicable) ³ - (Closure Guidance Item 3.16) - Continued	OU5 Integrated Remedial Design Packages for Individual Remediation Areas	Area/Phase-Specific Landfill Closure Requirements: To be submitted (if applicable)
	Area 1, Phase II Integrated Remedial Design Package, September 1998	Sludge Drying Beds (41): Included within Appendix A, Design Criteria Package, Table A-2, p. A-32, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
	DRAFT Implementation Plan for Area 3A/4A, March 2000	Storage Pad North of Plant 6 (36): Included within Appendix A, Design Criteria Package, Table A-2, pp. A-69 to A-74, but not anticipated to be applicable since HWMU to be clean (risk-based) closed by removal.
11. Certification (Closure Guidance Item 3.18)	OU1 Remedial Action Report	Certification Sampling Results: To be Submitted
	OU3 Project Completion Reports	Summary of HWMU Remediation Activities/Statement of Conformance with Requirements and Performance Standards: To be Submitted for Each D&D Complex
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	FINAL Thorium/Plant 9 Complex Project Completion Report, April 1999	Plant 9 Warehouse - Bldg. 81 (35): Section 2.2.11, pp. 12 to 14
	FINAL Project Completion Report for the Decontamination of HWMU No. 50 - UNH Tanks, Hot Raffinate Building and HWMU No. 28 - Trane Incinerator, May 1999	Trane Incinerator (28); UNH Tanks - Raffinate Bldg. (50)
	FINAL Miscellaneous Small Structures Decontamination and Dismantlement Project, Task Order #432 Completion Report, October 1999	Waste Oil Decant Shelter (component of Trane Incinerator) (28): Section 2.3, pp. 3 to 5 KC-2 Warehouse - Bldg. 63 (34) Section 2.4, pp. 5 to 6
	OU5 Certification Reports for Individual Remediation Areas:	Area/Phase-Specific Certification Reports: To be Submitted
	FINAL Certification Report for Area 1, Phase II, October 2000	Sludge Drying Beds (41): Section 2.1.5,3, Sector 3 Certification Units, pp. 2-9 to 2-11: Section 2.3, Statistical Analysis, pp. 2-12 to 2-13; Section 3.1, Excavation Activities, p. 3-1; Section 3.2, Changes to Scope of Work, pp. 3-3 to 3-5; Section 5.2, Sludge Drying Bed HWMU Closure, p. 5-3
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	OU3 FINAL Record of Decision for Interim Remedial Action, June 1994	Status of Production Area HWMUs After OU3 Remedial Action: Section 5.4, p. 11
· ·	OU3 Final Record of Decision for Final Remedial Action, September 1996	Integration of the Interim and Final Remedial Actions, Section 2.1, p. 9
	OU5 FINAL Record of Decision, January 1996	Status of FEMP After Soil and Groundwater Remediation: Section 4.0, p. 4-1
	OU5 FINAL Sitewide Excavation Plan, July 1998	Certification Reports: Section 7.4, pp. 7-10 to 7-14
	OU5 Certification Reports for Individual Remediation Areas	Status of those HWMUs That Had Soil Contamination After Soil Remedial Action: To be Submitted

¹ Closure Guidance Items are from the Closure Plan Review Guidance for RCRA Facilities, Ohio EPA, March 1999.

² The perched water contamination has many sources, only some of which are the HWMUs. Because of this, it is difficult or impossible to identify the degree to which a HWMU may have contributed to perched water contamination. Therefore, the nature and extent of contamination in the perched water, and the most appropriate remedial action method and objectives, are best achieved under the CERCLA process alone.

³ Ohio EPA has two options for clean closure where there are no more RCRA requirements (i.e., no post-closure requirements) for the existing HWMUs: (1) complete removal of waste and impacted environmental media, and (2) complete removal of waste and impacted environmental media to health-based standards (known at the FEMP as Final Remediation Levels, FRLs). Post closure requirements will, however, be applicable to the CERCLA on-property disposal cell as it will take some soil and debris contaminated with RCRA-hazardous waste [see Post Closure Care and Inspection Plan, On-Site Disposal Facility (20100-PL-010, Rev. 1, July 1997)].